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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 : DELPHI CORPORATION, et al. : Case No. 05-44481 (ajg) : Jointly Administered

## NOTICE OF APPEARANCE, REQUEST FOR ADDITION TO MASTER SERVICE LIST, AND DEMAND FOR SERVICE OF PAPERS

**PLEASE TAKE NOTICE,** that National Molding Corporation ("Creditor"), by its attorneys, Pryor & Mandelup, L.L.P., hereby appears in the above-captioned Chapter 11 case, pursuant to section 1109(b) of Chapter 11, Title 11, United States Code, 11 U.S.C. §§ 101 *et. seq.*, as amended (the "Bankruptcy Code"), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

**PLEASE TAKE FURTHER NOTICE,** that Creditor, by its attorneys, Pryor & Mandelup, L.L.P., demands, pursuant to Sections 349 and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 3017, 4004, 4007 and 9007, that copies of all notices, statements, papers, and pleadings

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given or filed in this case, be given and served upon them at the following address, facsimile,

telephone numbers and email addresses:

Pryor & Mandelup, LLP

675 Old Country Road

Westbury, New York 11590

Attn: A. Scott Mandelup, Esq. and Kenneth A. Reynolds, Esq.

Tel.: (516) 997-0999

Fax.: (516) 333-7333

Email: asm@pryormandelup.com and kar@pryormandelup.com

PLEASE TAKE FURTHER NOTICE, that, pursuant to Paragraph "15(f)" of the

"Case Management Order" entered October 8, 2005 in the above-captioned case, that Creditor, by

its attorneys, Pryor & Mandelup, L.L.P., requests that Creditor, at the aforementioned address, be

added to the Master Service List in this case.

PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only the

notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules specified above,

but also includes, without limitation, all orders, notices, hearing dates, applications, motions,

petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and

statements of affairs, operating reports, plan or plans of reorganization or liquidation, and disclosure

statements, whether transmitted or conveyed by mail, courier service, telegraph, facsimile, telex, or

otherwise, that affect the above-captioned debtor or its estate.

PLEASE TAKE FURTHER NOTICE, that neither this notice nor any subsequent

appearance, pleading, claim or suit is intended to waive and shall not constitute a waiver of

(i) Creditor's right to have final orders in non-core matters entered only after *de novo* review by a

District Court; (ii) Creditor's right to a jury trial in any proceedings so triable herein, or in any case,

controversy, or proceeding related hereto; (iii) Creditor's right to request to have the reference

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withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Creditor is or may be entitled to under agreements, documents or instruments, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: Westbury, New York October 21, 2005

PRYOR & MANDELUP, LLP Attorneys for National Molding Corporation

By: /s/ A. Scott Mandelup

A. Scott Mandelup (ASM2780) Kenneth A. Reynolds (KAR3808)

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Allan S. Brilliant, Esq. and Brian W. Harvey, Esq. Goodwin Procter LLP Counsel for the Ad Hoc Committee of Prepetition Secured Lenders 599 Lexington Avenue New York, New York 10022

All Parties Identified on the Master Service List Maintained by Debtor, a copy of which is annexed hereto